

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES, AND  
PRODUCTS LIABILITY LITIGATION**

This Document Applies to All Actions Filed  
Against Defendant Personal Care Products  
Council

MDL No. 16-2738 (FLW) (LHG)

**NOTICE OF DEFENDANT PERSONAL  
CARE PRODUCTS COUNCIL'S MOTION  
FOR SUMMARY JUDGMENT**

**Return Date:** June 3, 2019 at 9:00 a.m.

**ORAL ARGUMENT REQUESTED**

**DEFENDANT PERSONAL CARE PRODUCTS COUNCIL'S  
NOTICE OF ITS MOTION FOR SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that, at 9:00 a.m. on June 3, 2019, or such other time and date set by the Court, Defendant Personal Care Products Council, by its undersigned counsel, will move before the Honorable Freda L. Wolfson, U.S.D.J., United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Room 2020, Trenton, NJ 08608, for an entry of an Order granting Defendant Personal Care Products Council's Motion for Summary Judgment.

**PLEASE TAKE FURTHER NOTICE** that, in support of its motion, Defendant Personal Care Products Council will rely on the Memorandum of Law, Statement of Facts and attached exhibits submitted herewith. A proposed form of Order is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that Defendant Personal Care Products Council requests oral argument on its motion.

Dated: May 6, 2019

Respectfully submitted,

PERSONAL CARE PRODUCTS COUNCIL

By: /s/ Thomas T. Locke

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document and supporting materials were filed electronically with the Clerk of the Court using the CM/ECF system and is available for viewing and downloading from the CM/ECF system. The forgoing documents were also served upon all counsel of record via the CM/ECF system on this 6th day of May, 2019.

SEYFARTH SHAW LLP  
*Attorneys for Personal Care Products Council*

/s/ Thomas T. Locke

Thomas T. Locke, Esq.